1 CHRISTOPHER CHIOU Acting United States Attorney 2 District of Nevada Nevada Bar No. 14853 3 ALLISON J. CHEUNG, CSBN 244651 4 Special Assistant United States Attorney 160 Spear Street, Suite 800 5 San Francisco, California 94105 Telephone: (510) 970-4811 Facsimile: (415) 744-0134 E-Mail: allison.cheung@ssa.gov 7 Attorneys for Defendant 9 UNITED STATES DISTRICT COURT 10 DISTRICT OF NEVADA 11 KAAREN MITCHELL, 12 Case No.: 2:20-cv-01936-EJY Plaintiff, 13 **UNOPPOSED MOTION FOR** EXTENSION OF TIME v. 14 (FIRST REQUEST) ANDREW SAUL, 15 Commissioner of Social Security, 16 Defendant. 17 18 Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests 19 that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or 20 Remand (Dkt. No. 19, filed on April 15, 2021), currently due on May 17, 2021, by 21 days, through 21 and including June 7, 2021. Defendant further requests that all subsequent deadlines set forth in the 22 Court's scheduling order (Dkt. No. 17) be extended accordingly. 23 This is Defendant's first request for an extension of time. Good cause exists for this extension 24 due to Defendant's counsel's workload as described below. Since Plaintiff's motion was filed on 25

April 15, 2021, Defendant's counsel has worked on over 25 district court cases. Counsel is also

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responsible for other substantive non-litigation matters in the Office of General Counsel. The Office of General Counsel also currently has a number of attorneys out on leave of absence, in addition to staff attrition, which has increased the undersigned's workload.

Additional time is required to review the record, to evaluate the numerous issues raised in Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as possible. This request is made in good faith and with no intention to unduly delay the proceedings, and counsel apologizes for any inconvenience.

On May 13, 2021, counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion.

It is therefore respectfully requested that Defendant be granted an extension of time to respond to Plaintiff's Motion for Reversal and Remand, through and including June 7, 2021.

Dated: May 13, 2021

Respectfully submitted,

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney

IT, IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: _____